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January 16, 2025

The motion to seal is GRANTED. The Clerk of Court is directed to terminate the motion at Dkt. 75.

VIA ECOURTS

Honorable Anun Subramanian, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

SO ORDERED.



Arun Subramanian, U.S.D.J.
Dated: January 17, 2025

Re: Go Global Retail, LLC v. Dream on Me Industries, Inc., et al.
Civil Action No. 1:23-cv-07987

Dear Judge Subramanian:

This firm represents defendants, Dream on Me Industries, Inc. and Dream on Me, Inc. (collectively "DOM") in the above referenced matter which involves allegations involving alleged trade secrets and has necessarily involved the discovery of proprietary and business information and documents which the parties assert are confidential in nature.

DOM files this letter motion today seeking leave to file its reply brief in further support of its summary judgment motion and the declaration of counsel which attaches additional exhibits under seal. Notably, Your Honor has previously granted a letter motions to seal similar documents in prior filings in this case and specifically related to this motion.

In accordance with Your Honor's individual practices, we will be filing an unredacted version of DOM's motion for summary judgment, as well as a redacted version of the motion and a version with the redactions highlighted which will also be filed under seal.

By way of background, in this case, plaintiff, Go Global Retail, LLC ("Go Global") alleges that DOM breached a Non-Disclosure Agreement (the "NDA") by improperly using allegedly confidential and proprietary information obtained from Go Global to successfully bid on the intellectual property assets of Buy Buy Baby ("BBBY") at a bankruptcy auction on June 28, 2023.

A Protective Order was entered in this case on April 22, 2024 which governs the filing of documents designated as confidential by the parties. [See Docket Entry 40]. The

parties have proceeded in reliance upon the presence of the stipulated Protective Order in this case, and therefore, good cause exists for the sealing of the documents and information referenced herein. Additionally, there is little public or private interest in disclosing the information referenced herein, and a no less restrictive alternative to this Motion to Seal would protect the parties' confidential information. Indeed, the vast majority of DOM's reply brief is unredacted and will be available for public view. Additionally, after further review and scrutiny, DOM has not even sought to seal or redact certain documents that it marked "Confidential" in discovery.

The majority of the documents which DOM has redacted or sought to seal completely are because Go Global has designated the documents or information "Confidential." The following exhibits attached to the Declaration of Thomas K. Murphy III contain information that Go Global has designated as confidential and have been redacted:

1. Exhibit AU - E-mail regarding potential investment of George Mrkonic.
2. Exhibit AV – Letter from Cart.com regarding potential investment.
3. Exhibit AX – E-mails between Ziff Davis and Go Global.
4. Exhibit AY – Additional e-mails between Ziff Davis and Go Global.
5. Exhibit AZ - Expert Report of Adam Hanover.

Based on the foregoing, DOM respectfully requests leave to file the unreacted version of its reply brief in further support of its summary judgment motion and the declaration of counsel with exhibits under seal. Additionally, DOM respectfully requests that Your Honor "So Order" this letter if it meets with Your Honor's approval.

Respectfully submitted,

GREENBAUM, ROWE, SMITH & DAVIS LLP

/s/ Thomas K. Murphy III

TKM

THOMAS K. MURPHY III

cc: All Counsel of Record (via ECF)